

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS (Chicago)

In re the matter of:

CAESARS ENTERTAINMENT
OPERATING COMPANY, INC.

Debtor.

CASE NO. 15-01145

JOINTLY ADMINISTERED
CHAPTER 11

JUDGE A BENJAMIN GOLDAR

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

TO:

**SEE ATTACHED SERVICE
LIST**

On July 22, 2015, at 1:30 p.m., I shall appear before the Honorable A. BENJAMIN GOLDAR in the Courtroom designated for the Caesars' Omnibus hearings in the Case Management Procedures Order [Docket 1165], at the Dirksen Federal Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, Courtroom # 2525, or in his / her absence, before such other Bankruptcy Judge as may be presiding in his/her place and stead, and shall then and there present the attached Motion to Modify the Automatic Stay at which time and place you may appear if you so see fit.

DONNA CERIONE, ET AL/DOMINIC DETETTA

By: /s/Amy A. Aronson

Amy A. Aronson

Attorneys for DONNA CERIONE, ET

AL/DOMINIC DETETTA

Amy A. Aronson

ARONSON & WALSH, P.C.

P.O. Box 5907

Vernon Hills, IL 60061

847.247.1810 / Attorneys for DONNA CERIONE, ET AL/DOMINIC DETETTA

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that I served a copy of this Notice with Motion to Modify the Automatic Stay attached, upon the parties listed on the attached list, by mailing same in a properly addressed envelope, postage prepaid, from the Vernon Hills Post Office, Lakeview Parkway, Vernon Hills, Illinois 60061, before the hour of 5:00 p.m. on the 3rd day of July, 2015, or via electronic notice as indicated above.

By: /s/Amy A. Aronson
Attorneys for DONNA CERIONE, ET

AL/DOMINIC DETETTA

Amy A. Aronson

ARONSON & WALSH, P.C.

P.O. Box 5907

Vernon Hills, IL 60061

847.247.1810

Attorneys for DONNA CERIONE, ET AL/DOMINIC DETETTA

SERVICE LIST

VIA ELECTRONIC FILING

All Registered CM/ECF and PACER Users

Caesars Entertainment Operating Company, Inc. (Debtor)
tlambert@caesars.com

Kirkland & Ellis LLP, Counsel to Debtors
james.sprayregen@kirkland.com; david.seligman@kirkland.com; david.zott@kirkland.com;
jeffrey.pawlitz@kirkland.com; ryan.dahl@kirkland.com; Jeffrey.zeiger@kirkland.com;
david.zott@kirkland.com; paul.basta@kirkland.com; nicole.greenblatt@kirkland.com;
christopher.greco@kirkland.com; stephen.hackney@kirkland.com
joe.graham@kirkland.com; cgreco@kirkland.com

Paul, Weiss, Rifkind, Wharton & Garrison LLP, Counsel to Caesars Entertainment Corp.
jsaferstein@paulweiss.com; slovett@paulweiss.com; lclayton@paulweiss.com;
jhurwitz@paulweiss.com;

Much Shelist, P.C., Counsel to Caesars Entertainment Corp.
jschwartz@muchshelist.com; fdosunmu@muchshelist.com

Akin Gump Strauss Hauer & Feld LLP, Counsel to Apollo Global Management LLC and certain of its affiliates
sbrauner@akingump.com; idizengoff@akingump.com; pdublin@akingump.com;
aqureshi@akingump.com; dzensky@akingump.com

AlixPartners, Chief Restructuring Officer for Debtors
reisenberg@alixpartners.com

American Express, Global Merchant Services, Interested Party
Craig.B.Mcdowell@aexp.com

Ansell Grimm & Aaron, P.C., Counsel to Christina L. Coppede
jga@ansellgrimm.com

Prime Clerk LLC, Claims Agent
ceocinfo@primeclerk.com



Arent Fox LLP, Counsel to BOKF, NA, solely in its capacity as Successor Indenture Trustee
andrew.silfen@arentfox.com; beth.brownstein@arentfox.com; mark.joachim@arentfox.com;
jackson.toof@arentfox.com;

Armstrong Teasdale LLP, Counsel to Aristocrat Technologies, Inc.
dgoing@armstrongteasdale.com; rengel@armstrongteasdale.com

Ballard Spahr LLP, Counsel to ACE American Insurance Company and certain of its affiliated entities
daluzt@ballardspahr.com; heilmanl@ballardspahr.com

Barack Ferrazzano Kirschbaum & Nagelberg LLP, Counsel to Elliot Management Corporation
william.barrett@bfkn.com

Barnes & Thornburg LLP, Counsel to City of Hammond, Indiana
pjacobi@btlaw.com

Bialson, Bergen & Schwab, Counsel to United Parcel Service, Inc.
Klaw@bbslaw.com

Bryan Cave LLP, Counsel to Indenture Trustee for the 10.00% Second-Priority Senior Secured Notes and US Foods, Hospitality Network, LLC, Agilysys NV, LLC and W. W. Grainger, INC.
stephanie.wickouski@bryancave.com; michelle.mcmahon@bryancave.com;
ryan.lawlor@bryancave.com; leslie.bayles@bryancave.com; aaron.davis@bryancave.com

Buchalter Nemer, Counsel to Oracle America, Inc. and Oracle Credit Corporation
schristianson@buchalter.com

Cahill Gordon & Reindel LLP, Counsel to Administrative Agent
wmiller@cahill.com

Carlson Dash, LLC, Counsel to the Ad Hoc Committee of Holders of the 12.75% Second Priority Senior Secured Notes
jaltshul@carlsondash.com; kcarlson@carlsondash.com

Certilman Balin Adler & Hyman, LLP, Counsel to Moti Partners, LLC
rmccord@certilmanbalin.com; cglick@certilmanbalin.com



Chapman and Cutler LLP, Counsel to Law Debenture Trust Company of New York, as Indenture Trustee for the 5.75% Notes and 6.50% Notes
benz@chapman.com

Christensen James & Martin, Counsel to Culinary and Bartenders Housing Partnership Fund
wes@cjmlv.com

Counsel to City of Reno, Business License Division
chaumpm@reno.gov

Crane, Heyman, Simon, Welch & Clar, Counsel to Sarah Lou Iovino
sclar@craneheyman.com

Ciardi Ciardi & Astin, Counsel to Iowa Racing and Gaming Commission
aciardi@ciardilaw.com

Credit Suisse AG, Cayman Islands Branch. Administrative Agent for Credit Facility
agency.loanops@credit-suisse.com; dennis.kao@credit-suisse.com

Delaware Trust Company, Indenture Trustee for the 10.00% Second-Priority Senior Secured Notes
shorwitz@delawaretrust.com

Drinker Biddle & Reath LLP, Counsel to the Ad Hoc Group of Holders of the Unsecured
james.millar@dbr.com; kristin.going@dbr.com; clay.pierce@dbr.com;
Timothy.Casey@dbr.com

Environmental Protection Agency - Region 5
nagle.richard@epa.gov

Farella Braun + Martel LLP, Counsel to VISA U.S.A. Inc
gkaplan@fbm.com

Foley & Lardner LLP, Counsel to BOKF, NA, solely in its capacity as Successor Indenture Trustee
hkaplan@foley.com; mhebbeln@foley.com; lapeterson@foley.com

Fox, Swibel, Levin & Carroll, LLP, Counsel to Old Republic Insurance Company and Zurich American Insurance Company, Counsel to Board of Levee Commissioners for the Yazoo-Mississippi Delta

nreid@fslc.com; rschultz@fslc.com; panderson@fslc.com

FrankGecker LLP, Counsel to PepsiCo, Inc.

jfrank@fgllp.com; jkleinman@fgllp.com

Counsel for Total Filtration

jsoh@polsinelli.com

Counsel to Rincon Band of Luiseno Indians

bminier@pedersenhoupt.com

Freeborn & Peters LLP, Counsel to Apollo Global Management LLC

rlauter@freeborn.com; deggert@freeborn.com; ejanczak@freeborn.com

Gardy & Notis LLP, Counsel to Frederick Barton Danner

mgardy@gardylaw.com; jnotis@gardylaw.com; mfarmer@gardylaw.com

Gibbons P.C., Counsel to J. Rockets Development, LLC

dcrapo@gibbonslaw.com

Glickfeld, Fields & Jacobson LLP, Counsel to interested party CBS Radio Stations Inc.

lmj@gfjlawfirm.com

Goldstein & McClintock LLLP, Counsel to South Jersey Gas

seanw@restructuringshop.com

Gould & Ratner LLP, Counsel to Gucci America, Inc.

mleipold@gouldratner.com

Gozdecki, Del Giudice, Americus, Farkas & Brocato LLP, Counsel to American Mart Corporation

s.leech@gozdel.com

Grant & Eisenhofer P.A., Counsel to Frederick Barton Danner

jeisenhofer@gelaw.com; gnovod@gelaw.com; earonowitz@gelaw.com



Howard & Howard Attorneys, Counsel to Konami Gaming, Inc.

earonowitz@gclaw.com; JMorgan@howardandhoward.com;
jtodhunter@howardandhoward.com; lgretchko@howardandhoward.com

Internal Revenue Service

Linda.Lorello@irs.gov

Jenner & Block LLP, Counsel to Caesars Entertainment Corporation

vlazar@jenner.com; csklarsky@jenner.com; dmurray@jenner.com; jvandeventer@jenner.com

Jennings Sigmond, P.C., Counsel to International Painters and Allied Trades Industry Pension Fund

dcosta@jslex.com; bankruptcy@jslex.com; mtokarsky@jslex.com

Johnson & Bell, Ltd. Counsel to Simon Property Group, L.P.

linnemanm@jbltd.com

Jones Day, Counsel to the Official Committee of Second Priority Noteholders

bbennett@jonesday.com; jjohnston@jonesday.com; slevinson@jonesday.com;
jmester@jonesday.com; mwiener@jonesday.com; pldouglas@jonesday.com;
gstewart@jonesday.com; trgeremia@jonesday.com; rmuttreja@jonesday.com;
apmcbride@jonesday.com

Kasowitz, Benson, Torres & Friedman LLP. Counsel to TPG Capital, L.P., David Bonderman, and Kelvin Davis

drosner@kasowitz.com; jgreenblatt@kasowitz.com; dfliman@kasowitz.com;
MFink@kasowitz.com

Katten Munchin Rosenman LLP, UMB Bank, NA, Indenture Trustee for the First Lien Notes

peter.siddiqui@kattenlaw.com; craig.barbarosh@kattenlaw.com;
david.crichlow@kattenlaw.com; karen.dine@kattenlaw.com

Kelley Drye & Warren LLP, Counsel to Wilmington Savings Fund Society

KDWBankruptcyDepartment@KelleyDrye.com; ewilson@kelleydrye.com;
kelliott@kelleydrye.com; mpage@kelleydrye.com

Kohner, Mann & Kailas, S.C., Counsel to Ecolab, Inc.

swisotzkey@kkmksc.com



Kramer Levin Naftalis & Frankel LLP, Counsel to Certain Holders of Caesars First Lien Bonds who have Signed Restructuring Support Agreements

keckstein@kramerlevin.com; ghorowitz@kramerlevin.com; dmannal@kramerlevin.com; deggermann@kramerlevin.com; mziegler@kramerlevin.com

Latham & Watkins LLP, Counsel to Caesars Acquisition Company

matthew.warren@lw.com

Law Debenture Trust Company of New York, Indenture Trustee for the 5.75% Notes and 6.50% Notes and Unsecured Notes

james.heaney@lawdeb.com; thomas.musarra@lawdeb.com

Levenfeld Pearlstein, Counsel to MicroStrategy

evandesteeg@lplegal.com; jfriedland@lplegal.com

Locke Lord LLP, Counsel to Entergy Mississippi

akatz@lockelord.com

Lowis & Gellen LLP, Counsel to Global Water Technology,

ccahill@lowis-gellen.com

Donald C. Marro, Interested Party

dmarro@crosslink.net

McDonald Hopkins LLC, Counsel to TPG Capital, L.P., David Bonderman, and Kelvin Davis

dagay@mcdonaldhopkins.com

McKenna Long & Aldridge LLP, Counsel to AEG Live LV LLC

gkleiner@mckennalong.com; kjorrie@mckennalong.com

Merkel & Cocke, P.A., Counsel to Oliver Evans,

tconnell@merkel-cocke.com

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. , Counsel to the Ad Hoc Committee of Holders of the 12.75% Second Priority Senior Secured Notes

jhbae@mintz.com; KRWalsh@mintz.com; bkannel@mintz.com

Much Shelist, P.C., Counsel to Caesars Entertainment Corp.

jschwartz@muchshelist.com; fdosunmu@muchshelist.com



Neal, Gerber & Eisenberg LLP, Counsel to Certain Holders of Caesars First Lien Bonds who have Signed Restructuring Support Agreements

mberkoff@ngelaw.com; wchoslovsky@ngelaw.com; nmiller@ngelaw.com; rradasevich@ngelaw.com

Paul, Weiss, Rifkind, Wharton & Garrison LLP, Counsel to Caesars Entertainment Corp.

jsaferstein@paulweiss.com; slovett@paulweiss.com; lclayton@paulweiss.com; jhurwitz@paulweiss.com; mgertzman@paulweiss.com

Novack and Macey LLP, Counsel to Wilmington Trust, National Association,

emacey@novackmacey.com; ssiegel@novackmacey.com; jja@novackmacey.com; acampbell@novackmacey.com

Pachulski Stang Ziehl & Jones LLP, Counsel to Elliot Management Corporation

jdavidson@pszjlaw.com; gglazer@pszjlaw.com; ljones@pszjlaw.com; jmorris@pszjlaw.com

Perkins Coie LLP, Counsel to Hilton

baudette@perkinscoie.com; dneff@perkinscoie.com

Proskauer Rose LLP, Counsel to the Statutory Unsecured Claimholders' Committee of Caesars Entertainment Operating Company, Inc., et al.

jmarwil@proskauer.com; ppossinger@proskauer.com; mthomas@proskauer.com; blevitan@proskauer.com

Pryor Cashman LLP, Counsel to Wilmington Trust Corporation

slieberman@pryorcashman.com; psibley@pryorcashman.com

Quarles & Brady LLP, Counsel to NV Energy

christopher.combest@quarles.com

Receivable Management Services, Agent for Creditor, EMC Corporation

Ronald.Rowland@iqor.com

Rubin LLC, Counsel to Gucci

prubin@rubinlawllc.com

Schulte Roth & Zabel LLP, Counsel to National Retirement Fund

james.bentley@srz.com



Securities & Exchange Commission

secbankruptcy@sec.gov; bankruptcynoticeschr@sec.gov;
chicago@sec.gov

Seward & Kissel LLP, Counsel to Law Debenture Trust Company of New York

ashmead@sewkis.com; alves@sewkis.com; das@sewkis.com

Reid, McCarthy, Ballew & Leahy, L.L.P., Counsel for Western Conference of Teamsters
Pension Trust Fund

rjr@rpmb.com

Wiener, Weiss & Madison, Counsel for Bossier Parish Policy Jury and Bossier City

rjnaus@wwmlaw.com

The Law Office of William J. Factor, Ltd., Counsel to Comenity Bank

wfactor@wfactorlaw.com

slorber@wfactorlaw.com

Shaw Fishman Glantz & Towbin LLC, Counsel to the Ad Hoc Committee of First Lien Bank
Lenders

proberts@shawfishman.com; bshaw@shawfishman.com; ddoyle@shawfishman.com

State of Georgia Attorney General

AGOlens@law.ga.gov

State of Indiana Attorney General

Constituent@atg.in.gov

State of Iowa Attorney General

webteam@ag.state.ia.us

State of Michigan Attorney General

miag@michigan.gov

State of Minnesota Attorney General

Attorney.General@ag.state.mn.us

State of Missouri Attorney General

attorney.general@ago.mo.gov



State of Tennessee Attorney General
bill.mccormick@ag.tn.gov

State of Utah Attorney General
uag@utah.gov

Stroock & Stroock & Lavan LLP
Counsel to Ad Hoc Committee of First Lien Bank Lenders
jcanfield@stroock.com; kpasquale@stroock.com; khansen@stroock.com; egilad@stroock.com; fmerola@stroock.com

U.S. Bank Global Corporate Trust Services, Indenture Trustee
deborah.ibrahim@usbank.com

Securities and Exchange Commission - Regional Office
bankruptcynoticeschr@sec.gov; chicago@sec.gov

Simon Property Group, L.P., Counsel to Simon Property Group as landlord
rtucker@simon.com

Smith Sersic, Counsel to City of Hammond
info@smithsersic.com

Stoel Rives LLP, Counsel to NV Energy, Inc.,
brandy.sargent@stoel.com; oren.haker@stoel.com; Jason.abrams@stoel.com

Streusand, Landon & Ozburn LLP, Counsel to Dell Marketing, L.P.
streusand@slollp.com

United States Trustee for the Northern District of Illinois
ustregion11.es.ecf@usdoj.gov; denise.delarent@usdoj.gov

Washington DC Attorney General
oag@dc.gov

White & Case LLP, Counsel to Wilmington Trust Corporation
tlauria@whitecase.com; cshore@whitecase.com; hdenman@whitecase.com

Subranni Zaubel LLC, Counsel to IGT
jtrofa@subranni.com; jleon@subranni.com; szauber@subranni.com



Testa, Heck, Scrocca & Testa, P.A., Counsel to Dorothy Cullen
mtesta@testalawyers.com

The Law Offices of C. G. Gordon Martin, Counsel to the Dennis Mehringer 401k
cggordonmartin@earthlink.net

The Law Offices of Roger J. Higgins, LLC, Counsel to Thermal Energy Limited Partnership I
rhiggins@rogerhigginslaw.com

The Stepnowski Law Offices, Counsel to Moti Partners, LLC
Frank@Steppergroup.com

Thompson LLP, Counsel of record for Standard Textile Co., Inc.
Louis.Solimine@Thompsonhine.com

Traub Lieberman Straus & Shrewsberry, Counsel to ANV (Lloyds)
cnadeau@traublieberman.com

U.S. Bank Global Corporate Trust Services
deborah.ibrahim@usbank.com

Ungaretti & Harris LLP, Counsel to Philip G. Satre
rsalsterda@uhlalaw.com

United States Trustee for the Northern District of Illinois
ustpreion11.es.ecf@usdoj.gov; denise.delarent@usdoj.gov

Weil, Gotshal & Manges LLP, Counsel to Hilton Worldwide, Inc.
debra.dandeneau@weil.com; david.griffiths@weil.com; dana.kaufman@weil.com

White & Case LLP, Counsel to Wilmington Trust Corporation,
tlauria@whitecase.com; cshore@whitecase.com; hdenman@whitecase.com

Winston & Strawn LLP, Counsel to Richard J. Davis, Examiner
ggartland@winston.com; chardman@winston.com; rreinthalder@winston.com;
dneier@winston.com

Womble Carlyle Sandridge & Rice, LLP, Counsel to Giesecke & Devrient America, Inc.
kmangan@wcsr.com; mpatterson@wcsr.com

Wyatt, Tarrant & Combs, LLP, Counsel to Churchill Downs,
dwaxman@wyattfirm.com



WPB Partners LLC, Interested Party
jmarshall@jimpartnersllc.com

Young Conaway Stargatt & Taylor, LLP. Counsel to Certain Second Lien Noteholders
rbrady@ycst.com; emorton@ycst.com; rpoppiti@ycst.com; jdorsey@ycst.com

Aronberg Goldgehn Davis & Garmisa
arapoport@agdglaw.com; jsciaccotta@agdglaw.com

Iron Mountain Information Management, LLC
Bankruptcy2@ironmountain.com

Linebarger Goggan Blair & Sampson, LLP
houston_bankruptcy@lgbs.com

Linebarger Goggan Blair & Sampson, LLP
ndilecf@dor.mo.gov

Pillsbury Winthrop Shaw Pittman LLP
kathy.jorrie@pillsburylaw.com; samuel.cavior@pillsburylaw.com



SERVICE BY U.S. MAIL

Caesars Entertainment Operating
Company, Inc.
Attn General Counsel
1 Caesars Palace Drive
Las Vegas, NV 89109

Arizona Department of Gaming
Dan Bergin, Director
1110 W. Washington St, Suite 450
Phoenix, AZ 85007

Attorney General for the State of Illinois
Attn Bankruptcy Section
500 S 2nd St
Springfield, IL 62701

Bureau of Gambling Control
Kamala D. Harris, Attorney General
4949 Broadway, Suite E-231
Sacramento, CA 95820

California Gambling Control Commission
Tina Littleton, Executive Director
2399 Gateway Oaks Dr. Ste 220
Sacramento, CA 95833-4231

Illinois Gaming Board (IGB)
Emily Mattison - General Counsel
160 North LaSalle
Suite 300
Chicago, IL 60601

Indiana Gaming Commission (IGC)
Ernest E. Yelton, Executive Director
East Tower, Suite 1600
101 W. Washington Street
Indianapolis, IN 46204

Internal Revenue Service
Centralized Insolvency Operation

PO Box 7346
Philadelphia, PA 19101-7346

Louisiana Gaming Control Board (LGCB)
Ronnie Jones, Chairman
7901 Independence Boulevard
Building A
Baton Rouge, LA 70806

Mississippi Gaming Commission
Allen Godfrey, Executive Director
620 North Street, Suite 200
Jackson, MS 39202

Missouri Gaming Commission
Roger Stottlemire, Executive Director
3417 Knipp Drive
P.O. Box 1847
Jefferson City , MO 65102

Nevada State Gaming Control Board &
Gaming Commission
Michael LaBadie, Marc Warren, and
David Staley
555 East Washington Ave.Suite 2600
Las Vegas, NV 89101

New Jersey Division of Gaming
Enforcement
David L. Rebuck, Director
1300 Atlantic Avenue
Atlantic City, NJ 08401-0000

North Carolina Department of Revenue
Lyons Gray, Secretary of Revenue
501 N Wilmington St
Raleigh, NC 27604

Ohio Casino Control Commission
John Barron, Deputy Executive Director &
General Counsel
10 West Broad Street, 6th Floor
Columbus, OH 43215

Pennsylvania Gaming Control Board
Kevin F. O'Toole, Executive Director
P.O. Box 69060
Harrisburg, PA 17106-9060

Attn: Bankruptcy Department
Department of Justice, Walter Sillers
Building
550 High Street, Suite 1200, P.O. Box 220
Jackson, MS 39205

State Lottery & Gaming Control Agency
Stephen L. Martino, Esq., Director
Montgomery Park Business Center
1800 Washington Blvd., Suite 330
Baltimore, MD 21230

State of Nevada Attorney General
Attn: Bankruptcy Department
Old Supreme Ct. Bldg.
100 N. Carson St.
Carson City, NV 89701

State of Arizona Attorney General
Attn: Bankruptcy Department
1275 W. Washington St.
Phoenix, AZ 85007

State of New Jersey Casino Control
Commission
Matthew B. Levinson, CEO
Arcade Building
Tennessee Avenue & Boardwalk
Atlantic City, NJ 08401-0000

State of California Attorney General
Attn: Bankruptcy Department
Consumer Law Section
455 Golden Gate Ave Ste 11000
San Francisco, CA 94102-7004

State of New Jersey Attorney General
Attn: Bankruptcy Department
Richard J. Hughes Justice Complex
25 Market Street, P.O. Box 080

State of Kentucky Attorney General
Attn: Bankruptcy Department
700 Capitol Avenue, Capitol Building
Suite 118
Frankfort, KY 40601

State of New York Attorney General
Attn: Bankruptcy Department
Department of Law -The Capitol, 2nd Fl.
Albany, NY 12224-0341

State of Louisiana Attorney General
Attn: Bankruptcy Department
P.O. Box 94095
Baton Rouge, LA 70804-4095

State of North Carolina Attorney General
Attn: Bankruptcy Department
Dept. of Justice
P.O. Box 629
Raleigh, NC 27602-0629

State of Maryland Attorney General
Attn: Bankruptcy Department
200 St. Paul Place
Baltimore, MD 21202-2202

State of Ohio Attorney General
Attn: Bankruptcy Department
State Office Tower 14th Floor
30 E. Broad St.
Columbus, OH 43266-0410

State of Massachusetts Attorney General
Attn: Bankruptcy Department
1 Ashburton Place
Boston, MA 02108-1698

State of Oregon Attorney General
Attn: Bankruptcy Department
Justice Bldg.
116 2 Court St. NE
Salem, OR 97301

State of Mississippi Attorney General

State of Pennsylvania Attorney General
Attn: Bankruptcy Department
1600 Strawberry Square
16th Floor
Harrisburg, PA 17120

State of South Carolina Attorney General
Attn: Bankruptcy Department
Remert C. Dennis Office Bldg.
P.O. Box 11549
Columbia, SC 29211-1549

State of Texas Attorney General
Attn: Bankruptcy Department
PO Box 12548
Austin, TX 78711-2548

State of Virginia Attorney General
Attn: Bankruptcy Department
900 East Main Street
Richmond, VA 23219

State of Washington Attorney General
Attn: Bankruptcy Department
1125 Washington St. SE
P.O. Box 40100
Olympia, WA 98504-0100

State of West Virginia Attorney General
Attn: Bankruptcy Department
State Capitol, Bldg 1 Room E 26
1900 Kanawha Blvd East
Charleston, WV 25305

State of Wisconsin Attorney General
Attn: Bankruptcy Department
Wisconsin Department of Justice
State Capitol, Room 114 East, P. O. Box
7857
Madison, WI 53707-7857

U.S. Bank National Association

Attn: Corporate Trust Services, Raymond
S. Haverstock
60 Livingston Avenue
St. Paul, MN 55107-1419

UMB Bank, National Association
Attn: Gavin Wilkinson
Corporate Trust and Escrow Services
120 South 6th Street, Suite 1400
Minneapolis, MN 55082

United States Attorney for the Northern
District of Illinois
Attn: Bankruptcy Section
219 S Dearborn St 5th Flr
Chicago, IL 60604

Law Office of Peter L Berk
Peter L. Berk
900 N Franklin Ste 505
Chicago, IL 60610

Wilmington Savings Fund Society, FSB
Attn: Patrick J. Healy
500 Delaware Avenue
Wilmington, DE 19801

Illinois Environmental Protection Agency
Attn: Director or Chief Legal Counsel
1021 N Grand Ave E
Springfield, IL 62702

Illinois Department of Revenue
Attn: Bankruptcy Section
PO Box 64338
Chicago, IL 60664-0338

Illinois Gaming Board (IGB)
Emily Mattison - General Counsel
160 North LaSalle
Suite 300
Chicago, IL 60601

Mesirow Financial Holdings, Inc.
Attn: Jeffrey M. Levine
353 North Clark Street
Chicago, IL 60654

Missouri Department of Revenue
Attention: Steven A. Ginther
Bankruptcy Unit
PO Box 475
Jefferson City, MO 65105-0475

Okin Hollander LLC
Attn: Margreta M. Morgulas
One Parker Plaza
12th Floor
Fort Lee, NJ 07024-0000

State of Connecticut Attorney General
Attn: Bankruptcy Department
55 Elm St.
Hartford, CT 06106

The Law Office of William J. Factor, Ltd.
Sara E. Lorber
105 W. Madison St., Suite 1500
Chicago, IL 60602

W. W. Grainger, Inc.
Attn: Michael Nawrocki
4465 E. Broadway Rd
Phoenix, AZ 85040

Wilmington Savings Fund Society, FSB
Attn: Patrick J. Healy
500 Delaware Avenue
Wilmington, DE 19801

Rosenthal & Rosenthal, Inc.
Attention: Anthony DiTirro
1370 Broadway
New York, NY 10018

State of Rhode Island Attorney General
Attn: Bankruptcy Department
150 S. Main St.
Providence, RI 02903

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS (Chicago)

In re the matter of:

CAESARS ENTERTAINMENT
OPERATING COMPANY, INC¹

Debtor.

CASE NO. 15-01145

JOINTLY ADMINISTERED
CHAPTER 11

JUDGE A BENJAMIN GOLDAR

MOTION TO MODIFY AUTOMATIC STAY

Now Comes DONNA CERIONE, ET AL/DOMINIC DETETTA, a creditor herein, by and through one of their counsel, Amy A. Aronson, Aronson & Walsh, P.C., its attorneys, and moves this Honorable Court for entry of an Order modifying the restraining provisions of § 362 of the Bankruptcy Code, granting relief to allow the movant to litigate the claim pending against the debtor in New Jersey, to enforce any judgment obtained therein solely against insurance coverage and/or liability insurer, and in support thereof respectfully represents as follows:

1. That on January 15, 2015, the Debtor herein filed a petition for relief under Chapter 11 of the Bankruptcy Code. The debtor, Caesars Entertainment Operating Company, Inc. continues to operate as debtors in possession under 11 US Code 1107(a) and 1108.

2. This court has subject matter jurisdiction over this matter pursuant to 28 USC Sections 157 and 1334. Venue is proper under 28 USC sections 1408 and 1409. This matter is a core proceeding pursuant to 28 USC Sec. 157(b)(2).

3. On December 2, 2013, Donna Cerione, as General Administratrix and Administratrix Ad Prosequendum and Guardian Ad Litem of Dominic Detetta, filed a three count complaint in the Superior Court of New Jersey Law Division [CUM-L-1017-13] against Caesars Entertainment Corporation, Caesars Entertainment License Company, LLC., Balley's Hotel and Casino, Balley's Wild West Casino, and John Doe Corporation. The complaint was

premised on a violation of the New Jersey Dram Shop Act, Pain and Suffering under the New Jersey Survivorship Act and Wrongful Death.

4. On or about June 24, 2014, an answer was filed by Defendant Bally's Park Place, Inc. dba Balley's Atlantic.

5. Through discovery plaintiff learned that there is an insurance policy which provides the coverage to the defendant debtor in the event of a loss such as this one. To the extent that such coverage is available, creditor moves this court to allow her to proceed in the Superior Court of New Jersey.

6. The movant seeks stay relief under 11 U.S.C. Section 362(d)(1) for the limited purpose of liquidating her claim against the debtor defendant as may be possible and appropriate and to enforce said judgment against the insurance coverage. Therefore the requested relief is limited to the insurance coverage and this creditor's right as an unsecured creditor in the Debtor's Chapter 11 bankruptcy case.

7. The Bankruptcy Code provides that upon request of a party in interest, the Court shall grant relief for cause under 11 USC Sc. 362(d)(1). The creditor bears the initial burden to establish prima facie case for stay relief. Then the burden shifts to the debtor to show why relief would be unwarranted. Cause can be as simple as a request to continue litigation in the place of origin if no great prejudice exists. *SCO Group, Inc.*, 395 B.R.852 (Bankr. D.Del. 2007)

8. Legislative history supports that with issues such as this one, modification of the stay is appropriate. Courts look at the factors surrounding the issues to make such a determination. *Plumberex Specialty*, 311 B.R. 551, 562-564; *Walker v. Wilde (In re Walker)* 103 B.R. 281, 284-285 (D.Utah 1989) and *In re: Curtis* 40 B.R. 795, 799 (Bankr. D. Utah 1984).

¹ The last four digits of Caesars Entertainment Operating Company Inc.'s tax identification number are 1623.

The *Curtis* Court outlined twelve factors for courts to weigh when considering modification of the stay:

- a) Whether relief will result in partial or complete resolution of the issues;
- b) The lack of any connection with or interference with the Bankruptcy Court;
- c) Whether the foreign proceeding involves the debtor as a fiduciary;
- d) Whether a specialized tribunal has been established to hear the particular cause of action and whether the tribunal has the expertise to hear such cases;
- e) Whether the debtor's insurance carrier has assumed full financial responsibility for defending the litigation;
- f) Whether the action essentially involves third parties, and the debtor functions only as a Bailee or conduit for the goods or proceeds in question;
- g) Whether the litigation in another forum would prejudice the interest of other creditors, the creditors' committee and other interested parties;
- h) Whether the judgment claim arising from the foreign action is subject to the equitable subordination under 510(c);
- i) Whether the movant's success in the foreign proceeding would result in a judicial lien avoidable by the debtor under Section 522(f);
- j) The interests of judicial economy and the expeditious and economical determination of litigation for the parties;
- k) Whether the foreign proceedings have progressed to the point where the parties are prepared for trial, and
- l) The impact of the stay on the parties and the "balance of hurt."

See, *Plumberex*, 311 B.R. at 559 citing and quoting *Curtis* 40 B.R. at 99-100.

The above factors weigh heavily in favor of stay modification in this matter.

9. Here, the New Jersey litigation involves a claim of wrongful death. Allowing the parties to fully litigate the issue in the Circuit Court would fully and completely resolve the issues. Allowing the claim to proceed is the only way to determine not only liability but the amount of liability.

10. The determination of liability would not interfere with the bankruptcy case, but would assist in the determination of the claim of the movant.

11. Because there is insurance coverage for the claim of the movant, the litigation would not affect any only creditor in the bankruptcy case nor would the litigation interfere with the bankruptcy process.

12. Allowing stay modification would also promote judicial economy. At the time the Bankruptcy was filed, the Complaint was filed and an answer to that complaint was also filed. The parties are at issue in the litigation and allowing it to proceed locally would support judicial economy.

13. Additionally, the Circuit Court of New Jersey is the proper venue for the determination of liability in a Wrongful Death case.

14. Maintaining the stay against a creditor such as DONNA CERIONE, ET AL/DOMINIC DETETTA works as a greater hardship than the Debtors would suffer. Here, the stay impacts the ability for the movant plaintiff to liquidate her damages while the debtors have no such impact. More importantly, the stay modification would not negatively impact the debtors because there is an insurer which will defend the underlying matter in accordance with its contractual obligations to do so.

15. That no cause exists to stay the execution of this order.

WHEREFORE, DONNA CERIONE, ET AL/DOMINIC DETETTA prays that this Honorable Court enter an Order modifying the restraining provisions of § 362 of the Bankruptcy Code to permit the said DONNA CERIONE, ET AL/DOMINIC DETETTA or its assigns to proceed against the non-debtor defendants; that Bankruptcy Rule 4001(a)(3) is waived and not applicable, and for such other and further relief as this court deems just and proper.

DONNA CERIONE, ET AL/DOMINIC DETETTA

By: /s/Amy A. Aronson
Amy A. Aronson, One of its Attorneys

Amy A. Aronson
ARONSON & WALSH, P.C.
P.O. Box 5907
Vernon Hills, IL 60061
847.247.1810
Attorneys for DONNA CERIONE, ET AL/DOMINIC DETETTA